

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	
)	
CARMITA COLEMAN)	Violation: Title 18, United States Code, Section 1343

COUNT ONE

The SPECIAL JANUARY 2020 GRAND JURY charges:

1. At times material to this Indictment:
 - a. Defendant CARMITA COLEMAN was a professor and interim dean at the Chicago State University College of Pharmacy.
 - b. Organization A was a national association of pharmacy school students committed to improving the health and educational and social environment of minority communities, and supporting minority representation in the pharmacy profession.
 - c. Organization A received funding to support its mission by collecting, among other funds, student and chapter dues, convention registration fees, and donations from corporate sponsors, including Sponsor A and Sponsor B.
 - d. Organization B was a national association of pharmacists committed to serving the underserved and promoting minorities in the pharmacy profession. The Board of Directors of Organization B appointed the Executive

Director of Organization A, a volunteer position, and required the Executive Director to submit annual reports regarding Organization A's finances and activities.

e. From in or around 2007 until in or around 2016, defendant COLEMAN was the Executive Director of Organization A, and was responsible for managing and controlling Organization A's finances.

f. In or around February 2016, the Board of Directors of Organization B appointed Individual B to replace defendant COLEMAN as the Executive Director of Organization A.

g. Organization A's funds were maintained in bank accounts for which defendant COLEMAN was an authorized signatory.

2. Beginning no later than in or around January 2011, and continuing until in or around October 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

CARMITA COLEMAN,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud Organization A and its corporate sponsors, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that defendant COLEMAN fraudulently solicited and obtained funds on behalf of Organization A based on false and misleading representations that the funds would be and were used to support Organization A's mission, when COLEMAN intended to, and did, spend the funds for her and her family's personal benefit, and not for the benefit of Organization A.

4. It was further part of the scheme that defendant COLEMAN knowingly created, and caused to be created, reports and presentations containing misleading statements about Organization A's funding needs and expenditures, to fraudulently induce corporate sponsors to donate funds to Organization A.

5. It was further part of the scheme that defendant COLEMAN withdrew cash and issued checks from Organization A's bank accounts, knowing that the money would be used for her and her family's personal benefit, and not for the benefit of Organization A. Defendant COLEMAN, at times, misrepresented the purpose of the checks by making false and misleading entries on check memo lines.

6. It was further part of the scheme that defendant COLEMAN made purchases using debit cards linked to Organization A's bank accounts, knowing that the purchases were for her and her family's personal benefit, and not for the benefit of Organization A.

7. It was further part of the scheme that defendant COLEMAN knowingly submitted, and caused to be submitted, false and misleading annual reports regarding Organization A's finances to Organization B, to conceal defendant

COLEMAN's personal cash withdrawals, checks, and expenditures that she made using Organization A's accounts.

8. It was further part of the scheme that defendant COLEMAN made false and misleading statements to representatives of Organization A and Organization B to assure them that Organization's A's funds had been used solely for legitimate expenditures and had not been used for defendant COLEMAN and her family's personal benefit, when, as defendant COLEMAN knew, she had used Organization A's funds for her and her family's personal benefit.

9. It was further part of the scheme that, after Organization B appointed Individual B as the new Executive Director of Organization A, defendant COLEMAN knowingly delayed the turnover of access to Organization A's bank accounts to Individual B to conceal the scheme, and to facilitate defendant COLEMAN's continued use of funds from Organization A for her and her family's personal benefit.

10. It was further part of the scheme that defendant COLEMAN misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence of the scheme and acts done in furtherance of the scheme.

11. As a result of the scheme, defendant COLEMAN fraudulently misappropriated approximately \$651,272 from Organization A.

12. On or about December 2, 2015, in the Northern District of Illinois, Eastern Division, and elsewhere,

CARMITA COLEMAN,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an email from defendant to [Individual A]@[Organization A].org attaching an Organization A proposal seeking additional funding from Sponsor A;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about April 26, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

CARMITA COLEMAN,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an email from defendant to a representative of Sponsor B, copying [Individual A]@[Organization A].org, seeking additional funding from Sponsor B for Organization A;

In violation of Title 18, United States Code, Section 1343.

COUNT THREE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about August 21, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

CARMITA COLEMAN,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an email from defendant to [Individual B]@[Organization B].net explaining that defendant would try to address Individual B's request to transition custody of Organization A's bank accounts from defendant to Individual B later that week;

In violation of Title 18, United States Code, Section 1343.

COUNT FOUR

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. Paragraphs 1 through 11 of Count One are incorporated here.
2. On or about October 5, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

CARMITA COLEMAN,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, an email from defendant to [Individual B]@[Organization B].net explaining that defendant would schedule a meeting to transfer custody of Organization A's bank accounts from defendant to Individual B later that day;

In violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Indictment, defendant CARMITA COLEMAN shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes but is not limited to a personal money judgment in the amount of approximately \$651,272.

3. If any of the property described above, as a result of any act or omission by defendant: cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

/s/ John R. Lausch, Jr., by TCM
UNITED STATES ATTORNEY